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GREAT AMERICAN
INSURANCE COMPANY

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

GREAT AMERICAN INSURANCE
COMPANY, an Ohio corporation,

Plaintiff,

vs.

TG ASSOCIATES, LLC, et al.,

Defendants.

Case 3:14-CV-01546 NMC

**STIPULATION TO DISMISS
KENNETH RAWLINGS,
LAWRENCE DEATHERAGE
AND THE KENNETH RAWLINGS
TRUST OF 2002 WITH
PREJUDICE; ORDER**

IT IS HEREBY STIPULATED through their designated counsel by and between plaintiff GREAT AMERICAN INSURANCE COMPANY and defendants KENNETH B. RAWLINGS, as an individual and as Trustee of The Kenneth Rawlings Trust Of 2002; The KENNETH RAWLINGS TRUST OF 2002; and LAWRENCE DEATHERAGE, as Guardian Ad Litem for Kenneth Rawlings, and as Successor Trustee for the Kenneth Rawlings Trust of 2002; that the above-captioned action be and hereby is dismissed with prejudice as to:

- 1.) KENNETH B. RAWLINGS, as an individual and as Trustee of The Kenneth Rawlings Trust Of 2002;
- 2.) The KENNETH RAWLINGS TRUST OF 2002; and
- 3.) LAWRENCE DEATHERAGE, as Guardian Ad Litem for Kenneth

Rawlings, and as Successor Trustee for the Kenneth Rawlings Trust of 2002.

This dismissal shall be of the aforementioned defendants only, with prejudice, pursuant to the settlement agreement entered into between them before Magistrate Judge Joseph Spero on May 3, 2016 and memorialized in a written settlement between the aforementioned parties. Magistrate Judge Norman Cousins of the United States District Court for the Northern District of California shall maintain jurisdiction over the Action in order to enforce the terms and conditions of the aforementioned parties' settlement agreement. The parties shall bear their own their own litigation expenditures, including attorneys' and consultants' fees, costs and expenses.

Respectfully submitted,

Dated: June 15, 2016

/s/

Michael J. Timpane
SALAMIRAD MORROW
TIMPANE & DUNN LLC

Attorneys for Plaintiff
Great American Insurance Company

Dated: June 15, 2016

/s/

Tyson Shower
HANSON BRIDGETT

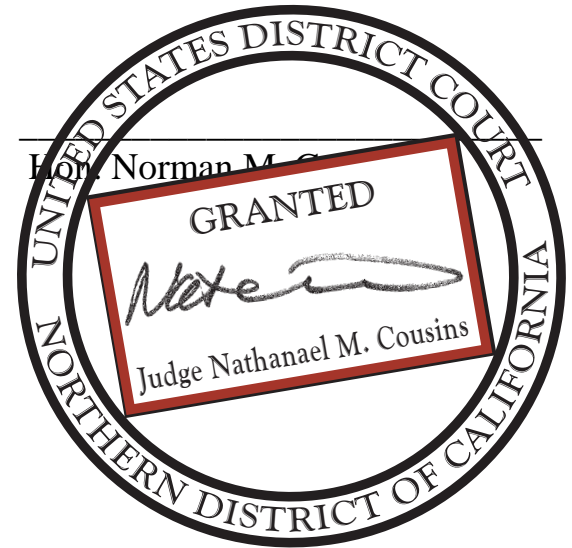
Attorneys for Defendants KENNETH B. RAWLINGS, as an individual and as Trustee of The Kenneth Rawlings Trust Of 2002; The KENNETH RAWLINGS TRUST OF 2002; and LAWRENCE DEATHERAGE, as Guardian Ad Litem for Kenneth Rawlings, and as Successor Trustee for the Kenneth Rawlings Trust of 2002

1 **SO ORDERED.**

2
3 DATED: June 20, 2016

4 **U.S. DISTRICT COURT,**
5 **NORTHERN DISTRICT OF**
6 **CALIFORNIA**

7 By: _____



PROOF OF SERVICE*Great American Insurance Group v. TG Associates, LLC*

U.S. District Court, Northern District of California, Case No.: 3:14-CV-01546 NMC

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is: Salamirad, Morrow, Timpane & Dunn LLP, 17901 Von Karman Avenue, Suite 500, Irvine, California 92614. On **June 15, 2016**, I served the within document(s): **STIPULATION TO DISMISS KENNETH RAWLINGS, LAWRENCE DEATHERAGE AND THE KENNETH RAWLINGS TRUST OF 2002 WITH PREJUDICE; ORDER** on the interested party(s) as follows:

- ☐ FACSIMILE - by transmitting via facsimile the document(s) listed above to the fax number(s) set forth on the attached Telecommunications Cover Page(s) on this date before 5:00 p.m.
- ☐ U.S. MAIL - by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Irvine, California addressed as set forth below. I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.
- ☐ PERSONAL SERVICE - by causing document(s) listed above to be personally delivered the person(s) at the address(es) set forth below.
- ☐ OVERNIGHT COURIER - by placing the document(s) listed above in a sealed envelope with shipping prepaid, and depositing in a collection box for next day delivery to the person(s) at the address(es) set forth below.
- ☒ ELECTRONIC – by electronically transmitting the document(s) listed above to the electronic notification address(es) of the addressee(s) listed below.

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I declare under penalty of perjury under the laws of the State of California that the
 above is true and correct. Executed on **June 15, 2016**, at Irvine, California.


 Sarah Quesada